

Exhibit 55

SCHOOL DISTRICT/LOCAL GOVERNMENT ENTITY PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF SCHOOL DISTRICT EXPERTS

Case No.: 4:22-md-03047-YGR

MDL No. 3047

In Re: Social Media Adolescent Addiction/Personal Injury Products Liability Litigation

Declaration of Holly Hammel

1. My name is Holly Hammel and I make this declaration based on my personal knowledge.

2. I received a Bachelor of Arts in Secondary Education in 1995 from Grove City College, PA, and a Master of Education, Educational Leadership in 2004 from Northern Arizona University, AZ.

3. I have 26.5 years experience working in K-12 education.

4. I have been Regional Assistant Superintendent at Tucson Unified School District (“TUSD”) since July 2018 and have worked within TUSD since 2009. Before being a Regional Assistant Superintendent, I was an Elementary Director and a Principal in TUSD.

5. In my position as Regional Assistant Superintendent, I oversee Principals that directly address the impact of social media. This includes school and classroom disruption and the time it takes to investigate and support these behavioral issues and communicate with parents.

6. Currently, addressing the effects of social media on TUSD is one of the biggest challenges we address as a district. Social media permeates and exacerbates many, if not most, of the substantial issues that students in my region’s schools are dealing with. Accordingly, a substantial amount of my work time, and the work time of my colleagues and the school site administrators, e.g., principals and assistant principals, that I oversee, and their staff, is spent addressing the fallout of social media’s negative impact on students.

7. In my experience, I have seen a growing problem of problematic social media use among our students. We face a constant battle in separating students from their phones as students are unable to regulate or control their use of social media.

8. Ultimately, there are numerous negative effects from students' personal use of social media that I and school administrators in our school district must address. These effects include, but are not limited to, classroom disruption, students' use of fake social media accounts which expose children to dangerous situations on social media, and/or bullying and harassment that occurs on social media platforms and spills over into the school environment.

9. Bullying and harassment that occurs on social media platforms exacerbate the issues I and the school site administrators I oversee and work with must address, as the bullying and harassment are disseminated further and for longer periods of time than they would be absent a social media platform and social media emboldens students to engage in this type of behavior that does not occur when interacting in person.

10. When anonymous school fight pages are created, we can't have them removed. We had a page created that identified a student as a school shooter. That student killed himself and his mother. He was 15. We have anonymous school pages on social media where specific students are targeted and bullied, and we can't remove or stop them.

11. School challenges posted on social media are highly problematic as Principals need to respond to the behavior and damage that result from students participating in the challenges.

12. These numerous negative effects from students' personal use of social media cause many issues that I must address as a Regional Assistant Superintendent and that the school site administrators I oversee and work with must address. For example, students can't reasonably focus when social media is such a disruptor. We've had a school install cell phone lockers to physically remove the cell phone and its access to social media away from the student because the alert jolts the student back to wanting to check their social media instead of staying focused in class. Fights

are arranged through social media as are drug deals. Principals must deal with social media constantly.

13. The time that I and the school site administrators I oversee and work with must spend on social media related impacts on students has substantially increased in the time that I have worked at TUSD.

14. Principals must spend much time intervening with the disruption caused by social media. Parents and students will bring them screen shots of threats or bullying and they spend much time investigating, solving and restoring. There was a great increase in the number of school threats this fall using social media. This disrupted the entire community and required additional resources such as Police and School Safety. Attendance was negatively impacted following the days after the threat was made. In my experience, kids sometimes engage in disruptive behavior on social media because they want the online acclaim and popularity that often comes with it through followers, likes, and comments.

15. When I first started as a Regional Assistant Superintendent in 2018, I believe that approximately 1% of an elementary school site administrator's time, 10% of a middle school site administrator's time, and 20% of a high school site administrator's time was spent on social media related concerns and addressing the impacts of students' personal social media use. By 2020, that number had risen to around 2% for elementary schools, 10% for middle schools, and 20% for high schools. Now in 2025, I believe elementary school site administrators spend anywhere from 2% - 5%, middle school site administrators anywhere from 25-30%, and high school site administrators 20-25% of their work time addressing social media concerns and the impacts of students' personal use of social media.

16. Because of the percentage of time that I and the school site administrators I oversee and work with spend on addressing social media impacts on students, this means we have less time to dedicate to other aspects of our jobs. For example, it is a consistent disruption that requires a response from the administrator because investigation is always involved. For social media threats, risk assessments must be completed and this takes our resources away from serving students during that time. When the threat is large enough, it will take the next several days to investigate, solve and communicate with all. The length of time that it takes to solve a social media issue is compounded by the quickness and vastness with which it is spread, and this leads to more time spent investigating, communicating with parents, and solving. There are also risk assessments involved which take time and resources from schools. The ripples are far outreaching and difficult to contain versus when these issues would occur verbally in passing in a hallway. Students can orchestrate plans quickly and this also leads to more students being involved. Schools have had to constantly adapt their cell phone policies to try to minimize disruption caused by social media.

17. While having additional school site administrators or similar staff would be helpful in addressing the negative impacts that the rising use of social media by students has had on students and the district, TUSD has not been able to increase hiring commensurate with the needs of the student population that has been negatively impacted by social media due to funding constraints.

18. I regularly interact with other Regional Assistant Superintendents overseeing schools within TUSD. Based on these interactions, my understanding is that my experience is representative and that other Regional Assistant Superintendents and the school site administrators in the schools they directly oversee also spend a significant amount of their days addressing social

media related concerns and that the amount of time they have had to spend on social media related concerns has increased substantially over the last several years.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May 13, 2025.



Holly Hammel